

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**EDUARDO GARCIA and JULIA GARCIA,**

Plaintiffs,

v.

**WELLS FARGO BANK, N.A.,**

Defendant.

Case No. 1:20-cv-02402

Hon. Rebecca R. Pallmeyer

**DECLARATION OF DR. DAVID E. HARTMAN IN SUPPORT OF DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT**

I, Dr. David E. Hartman, Ph.D, MS, ABN, ABPP, hereby declare as follows:

1. I am a health care provider who is licensed to practice neuropsychology and psychology in Illinois. Since 1982 I have operated a private practice for clinical, forensic, and medical neuropsychology and clinical psychology in Chicago, Illinois. I have served as a neuropsychological and psychological consultant to the Isaac Ray Center for Psychiatry and Law at Rush Presbyterian St. Luke's Hospital. At the same time, I also served as the Clinical Director of the Rush Human Performance Lab for the Isaac Ray Center for Psychiatry and Law at Rush Presbyterian St. Luke's Hospital. Prior to that, I served as the Director of inpatient and outpatient hospital neuropsychological services for Cook County Hospital.

2. I received my Ph.D in clinical/cognitive psychology from the University of Illinois at Chicago in 1982. I was board certified in Clinical Neuropsychology by the American Board of Professional Neuropsychology (ABN) in 1994. I received board certification in Clinical Psychology from the American Board of Profession Clinical Psychology (ABPP-CL) in 2006. I earned my MS in psychopharmacology from Alliant University in 2013. I completed

my residency in psychology at Michael Reese Hospital and Medical Center in Chicago, Illinois. I am a health care provider who is licensed to practice neuropsychology and psychology in Illinois.

3. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could competently testify thereto.

4. I have been retained by the Defendant Wells Fargo Bank, N.A. ("Wells Fargo"), as an expert in this case to review Plaintiffs Julia Garcia and Eduardo Garcia's medical records and perform independent medical examinations of Plaintiffs. I have been asked to evaluate the emotional distress allegations and medical conditions pertinent to this case, including Mrs. Garcia's alleged Major Depressive Disorder, depression, and anxiety. I have also been asked to evaluate Mr. Garcia's emotional distress allegations and medical conditions pertinent to this case, including his alleged anxiety and depression.

5. Attached hereto as Exhibit A is a true and correct copy of the May 31, 2022 report of the independent medical examination of Julia Garcia conducted on May 12, 2022.

6. Attached hereto as Exhibit B is a true and correct copy of the May 27, 2022 report of the independent medical examination of Eduardo Garcia conducted on May 12, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7th day of June in 2022 in Chicago, Illinois.

/s/   
Dr. David E. Hartman

**Certificate of Service**

The undersigned, an attorney, hereby certifies that on the 16th day of June, 2022, the foregoing Declaration of Dr. David E. Hartman in Support of Defendant's Motion for Summary Judgment was filed electronically with the Clerk of the Court for the United States District Court for the Northern District of Illinois, and was served by operation of that Court's electronic filing system on all parties of record.

Dated: June 16, 2022

/s/ Shawn R. Obi

Shawn R. Obi